



Jeffrey A. Simes
+1 212 813 8879
jsimes@goodwinlaw.com

Goodwin Procter LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
goodwinlaw.com
+1 212 813 8800

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VIA COURIER AND ECF

The Honorable Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Bridgewater Capital Partners LLC v. Quadrum Global, et al.,
Civil No. 16-2834 (KAM/LB), ECF. No. 45

Dear Judge Matsumoto:

We are counsel to Defendants in the above-referenced matter. We write to provide you with an update regarding Defendants' Motion to Vacate Notice of Pendency (the "Motion"). (ECF Nos. 45-49).

As Plaintiff's counsel is aware, Defendants have initiated a sales process for 15 Huron Street, Brooklyn, NY (the "Property"), which is the subject of the Notice of Lis Pendens (the "Notice") that Defendants' Motion seeks to vacate. (*See* Pl.'s Notice of Lis Pendens, ECF. No. 13). The Notice is adversely affecting that sales process. We expect that our clients will assert counterclaims to recover the damages they are now incurring on an ongoing basis. Nonetheless, we wanted to inform the Court that the continuing existence of Plaintiff's improper Notice is having a significant, real-world effect.

We know that the Court's docket is busy, and we understand that it may be some time until the Court has the opportunity to review Defendants' motion to dismiss (ECF No. 37). We would nonetheless appreciate any early attention the Court may be able to direct to the motion concerning the notice of pendency (ECF No. 45), as it may help avoid broadening this case with new claims and issues.

Sincerely,

Jeffrey A. Simes

cc: Avery S. Mehlman, Esq. (*Counsel for Plaintiff*)